

1 LISA A. MCCLANE, ESQ.  
Nevada Bar No. 10139  
2 **JACKSON LEWIS P.C.**  
300 S. Fourth Street, Suite 900  
3 Las Vegas, Nevada 89101  
Tel: (702) 921-2460  
4 Fax: (702) 921-2461  
E-Mail: [lisa.mcclane@jacksonlewis.com](mailto:lisa.mcclane@jacksonlewis.com)

5 *Attorneys for Defendant*  
6 *Pro-Vigil, Inc.*

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**  
10

11 JULIUS CZUDAR,

12 Plaintiff,

13 vs.

14 PRO-VIGIL, INC., a foreign Corporation  
15 headquartered in Texas,

16 Defendant.

Case No.: 2:19-cv-01784-GMN-NJK

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR DEFENDANT  
RESPOND TO PLAINTIFF'S  
COMPLAINT**

**(Second Request)**

17 IT IS HEREBY STIPULATED by and between Plaintiff Julius Czudar ("Plaintiff"),  
18 through his counsel Mullins & Trenchak, Attorneys at Law, and Defendant Pro-Vigil, Inc.,  
19 ("Defendant"), through its counsel Jackson Lewis P.C., that Defendant shall have up to and  
20 including Tuesday, December 17, 2019, in which to respond to Plaintiff's Complaint. This  
21 Stipulation is submitted and based upon the following:

- 22 1. That Defendant's answer or response is currently due on December 3, 2019.
- 23 2. That this is the second request for an extension of time for Defendant to respond to  
24 Plaintiff's Complaint.
- 25 3. That such an extension is necessary because defense counsel has been out of the  
26 office due to familial medical issues and counsel need an opportunity to discuss possible resolution  
27 of issues which may alleviate the need for an anticipated motion to dismiss.
- 28 4. That this request is made in good faith and not for the purpose of delay.

5. That nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

Dated this 2nd<sup>th</sup> day of December, 2019.

MULLINS & TRENCHAK, ATTORNEYS AT LAW JACKSON LEWIS P.C.

*/s/ Philip J. Trenchak*  
 PHILIP J. TRENCHAK, ESQ.  
 Nevada State Bar No. 9924  
 VICTORIA C. MULLINS, ESQ.  
 Nevada State Bar No. 13546  
 1614 S. Maryland Parkway  
 Las Vegas, Nevada 89104

*Attorneys for Plaintiff  
Julius Czumak*

/s/ Lisa A. McClane  
LISA A. MCCLANE, ESQ.  
Nevada Bar No. 10139  
300 S. Fourth Street, Ste. 900  
Las Vegas, Nevada 89101

*Attorneys for Defendant*  
Pro-Vigil, Inc

## ORDER

IT IS SO ORDERED:

United States Magistrate Judge

Dated: December 2, 2019